

STATE OF SOUTH CAROLINA

(Caption of Case)

Example: Application for a Class C Charter Certificate from  
John Doe dba Doe's Limo

Checker Yellow Cab Co. Inc.

Complainant/Petitioner

v.

Ard's Airport Shuttle  
Best way Shuttle Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

TRANSPORTATION COVER SHEET

DOCKET

NUMBER: 2009 - 317 - T

If this is your first time filing an application with the PSC, you will not have a Docket Number. The Commission will assign one to you. If you have filed with the Commission before, a Docket Number was assigned and should be entered above.

(Please type or print)

Submitted by: Dallas D. Ball

Telephone: (803) 794-8608

Address: P.O. Box 419

Fax: \_\_\_\_\_

Ballentine, S.C. 29002

Other: \_\_\_\_\_

Email: \_\_\_\_\_

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

NATURE OF ACTION (Check all that apply)

- |   |  |
|---|--|
| <input type="checkbox"/> Application – Class C Taxi   | <input type="checkbox"/> Request to Amend Scope of Authority           |
| <input type="checkbox"/> Application – Class C Charter  | <input type="checkbox"/> Request to Amend Tariff (rate increase, etc.) |
| <input type="checkbox"/> Application – Class C Charter Bus  | <input type="checkbox"/> Request to Amend Passenger Limit              |
| <input type="checkbox"/> Application – Class C Non-Emergency  | <input type="checkbox"/> Request                                       |
| <input type="checkbox"/> Application – Class E Household Goods  | <input type="checkbox"/> Exhibit                                       |
| <input type="checkbox"/> Application – Class E Hazardous Waste  | <input type="checkbox"/> Late-Filed Exhibit                            |
| <input type="checkbox"/> Application  | <input type="checkbox"/> Letter  |
| <input type="checkbox"/> Request for Extension to Comply with Order   | <input type="checkbox"/> Proposed Order                                |
| <input type="checkbox"/> Request for Order Granting Authority to Obtain Certificate of Public Convenience and Necessity to Be Rescinded | <input type="checkbox"/> Publisher's Affidavit                         |
| <input type="checkbox"/> Request for Cancellation of Certificate  | <input type="checkbox"/> Reservation Letter                            |
| <input type="checkbox"/> Request for Suspension   | <input type="checkbox"/> Response                                      |
| <input type="checkbox"/> Request for Reinstatement  | <input type="checkbox"/> Return to Petition                            |
| <input type="checkbox"/> Request for Name Change on Certificate   | <input checked="" type="checkbox"/> Other: <u>Discovery</u>            |

# DALLAS D. BALL, P.C.

ATTORNEY AT LAW

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690-C Columbiana Dr.  
Suite 200  
Columbia, SC 29212

October 15, 2009

Charles L.A. Terreni  
S.C. Public Service Commission  
Synergy Business Park  
101 Executive Center Drive  
Columbia, S.C. 29210

RE: Checker Yellow Cab Co., Inc. v. Ards Airport Shuttle Service, & Best  
Way Shuttle Service  
Docket Number 2009-317-T

Dear Mr. Terreni:

Enclosed for filing, please find Checker Yellow Cab Co., Inc.'s, Interrogatories and Request for Production to Defendant Ards Airport Shuttle Service. By copy of this letter and certificate of service a copy of the documents are being served on all parties of record.

Thank you for your assistance in this matter.

Sincerely,



Carl D. Brewer  
Paralegal to Dallas D. Ball

DDB/cb  
Enclosure  
cc: parties of record

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2009-317-T**

Checker Yellow Cab Co, Inc,	)	
	)	
Complainant/Petitioner,	)	
	)	
vs.	)	<u>INTERROGATORIES</u>
	)	<u>TO DEFENDANT</u>
	)	
Ards Airport Shuttle Service,	)	
Best Way Shuttle Service,	)	
	)	
Defendants	)	
_____	)	

TO: ARD'S AIRPORT SHUTTLE SERVICE

PURSUANT to 26 S.C. Code Ann. Regs § 103-833 (Supp. 2008), the Complainant hereby request the Defendants, through their personal knowledge, as well as to the knowledge of Defendant's attorney(s), investigators, agents and other representatives, or those of whom are most knowledgeable with respect to the subject to which each respective Interrogatory is addressed. The Defendants are requested to serve their answer to these Interrogatories within twenty (20) days following service of same. These Interrogatories shall be deemed to be of a continuing nature so as to require supplementation and amendment promptly as needed in order to comport with facts and information that is not known or available to Defendants when their initial answers to these Interrogatories are served.

**INTERROGATORIES:**

1. Set forth the Municipalities or Cities for which you hold a business license.
2. Set forth the amount of business license fees paid to any and all government entities for the years of 2008 and 2009.
3. Set forth a listing of all vehicles used in the operation of your business.

For each vehicle listed above set forth:

the year, make, and model of the vehicle:

the name of the liability insurance carrier and the limits of coverage;

4. Set forth a list of all employees, agents, or independent contractors for your business for the past year, from August 1, 2008 to August 1, 2009.
5. Are the vehicles used in your business radio dispatched?
6. Do you maintain daily manifest logs for your vehicles?
7. If your answer to Interrogatory 7 is yes, set forth the name of the person who has custody and control of the logs.
8. Set forth the hourly rate for limousine service.
9. Set forth the rate you charge for transportation from Columbia Metro Airport to Downtown Columbia.
10. Set forth the rate you charge for transportation from Columbia Metro Airport to Embassy Suites Hotel.

Ballentine, S.C.

10/13/09

DALLAS D. BALL, P.C.

BY:

  
DALLAS D. BALL.

Post Office Box 419

Ballentine, South Carolina 29002

(803) 794-8608

ATTORNEY FOR DEFENDANTS

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2009-317-T**

Checker Yellow Cab Co, Inc,	)	
	)	
Complainant/Petitioner,	)	
	)	
vs.	)	<u>REQUEST FOR</u>
	)	<u>PRODUCTION</u>
	)	
Ards Airport Shuttle Service,	)	
Best Way Shuttle Service,	)	
	)	
Defendants	)	
_____	)	

TO: ARD'S AIRPORT SHUTTLE SERVICE

1. For each entity identified in your answer to Interrogatory 1, provide a copy of the corresponding business license.
2. For each vehicle identified in your answer to Interrogatory 2, please provide a copy of the title and insurance policy.
3. For each person identified in your answer to Interrogatory 4, provide:
  - Copy of any permits required by local governments for the operation of a vehicle for hire.
  - Copy of Criminal background check.
  - Payroll information to include rate of pay, federal, state and local withholding, unemployment tax, workers compensation.
  - Provide copies of the daily manifest for each vehicle and driver from April 1, 2008 to September 1, 2009.
4. Provide copies of Federal and State Tax returns for the tax year 2008 for the business and for all principals/owners of the business.

5. Provide a copy of the personal property tax return as required by SC Dept of Revenue for the tax year 2008.
6. Provide a copy of your rate plan or cost per trip that is currently in use.
7. Provide a copy of any certificate, or other document that indicates your business entity, i.e. D/B/A, Solo Proprietor, LLC, LLP, Corporation etc.

DALLAS D. BALL, P.C.

BY:

  
DALLAS D. BALL.

Post Office Box 419

Ballentine, South Carolina 29002

(803) 794-8608

ATTORNEY FOR DEFENDANTS

Ballentine, S.C.

Dated: 13 Oct '09

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2009-317-T**

Checker Yellow Cab Co, Inc,	)	
	)	
Complainant/Petitioner,	)	
	)	
vs.	)	<u>CERTIFICATE OF</u>
	)	<u>SERVICE</u>
	)	
Ard's Airport Shuttle Service,	)	
Best Way Shuttle Service,	)	
	)	
Defendants	)	
_____	)	

I, Carl D. Brewer, Paralegal to Dallas D. Ball, P.C., certify that I deposited the document(s) listed below and addressed as set forth below, in the United States Mail with first class postage affixed thereto this 15th day of October, 2009.

Documents: Interrogatories, Request for Production

Mailed to:

Thomas C. Ard d/b/a  
Ard's Airport Shuttle Service  
13 Yashica Court  
West Columbia, South Carolina 29172

Jeff Nelson, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

  
\_\_\_\_\_  
Carl D. Brewer, Paralegal